

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)	
)	
Amendment of Section 73.622(i),)	MB Docket No: 15-2
Post-Transition Table of DTV Allotments,)	RM-11744
Television Broadcast Stations)	
(Lansing, Michigan))	
)	

COMMENTS

WLAJ-TV LLC (“WLAJ Licensee”), licensee of WLAJ-TV, channel 51, Lansing, Michigan, by the undersigned attorneys, hereby submits its Comments in the above-captioned proceeding. In response to a Petition for Rule Making filed by WLAJ Licensee on December 4, 2014 (the “Petition”), the Commission released a Notice of Proposed Rule Making proposing the substitution of DTV Channel 25 for DTV Channel 51 at Lansing, Michigan.¹ WLAJ Licensee hereby reaffirms its interest in the proposed channel substitution. As outlined in the Petition, the channel substitution will serve the public interest because it will remove any potential interference with a wireless licensee in the Lower 700 MHz A Block located directly adjacent to Channel 51 in Lansing.

If the proposal set forth herein is adopted, WLAJ Licensee will promptly file the appropriate applications to specify operation of WLAJ-TV on DTV Channel 25 at Lansing, Michigan with facilities consistent with those specified in the Engineering Statement attached to the Petition and, if authorized, will construct the facilities contemplated therein and place the station into operation.² Attached for staff convenience is the Technical Statement of du Treil, Lundin & Rackley, Inc., provided as an attachment to the Petition supporting the instant proposal to allot DTV Channel 25 to

¹ See *Notice of Proposed Rule Making*, DA 15-15, MB Docket No. 15-2, RM-11744 (rel. January 7, 2015). The Federal Register Notice that set a January 30, 2015, comment deadline for this proceeding was released on January 15, 2015. See 80 Fed. Reg. 2077 (Jan. 15, 2015). Accordingly, the instant comments are timely filed.

² See Exhibit 1 to the Petition.

EXHIBIT 1

du Treil, Lundin & Rackley, Inc.

Consulting Engineers

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WLAJ(TV)
LANSING, MICHIGAN

October 30, 2014

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WLAJ(TV)
LANSING, MICHIGAN

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TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WLAJ(TV)
LANSING, MICHIGAN

Technical Statement

This Technical Exhibit was prepared on behalf of television broadcast station WLAJ(TV), Lansing, Michigan (Channel 51), in support of a Petition for Rulemaking to amend Section 73.622(i) of the FCC Rules to change the WLAJ(TV) digital television channel. WLAJ(TV) is an ABC network affiliated station.

WLAJ(TV) is authorized for operation on Channel 51 with a maximum directional effective radiated power (ERP) of 900 kW and antenna height above average terrain (HAAT) of 300 m.* WLAJ(TV) has entered into a voluntary agreement with the licensee of the lower 700-MHz Block A spectrum (T-Mobile) that contemplates the migration of WLAJ(TV) from Channel 51 to Channel 25. Accordingly the licensee of WLAJ(TV) is proposing the substitution of Channel 25 for Channel 51 at Lansing, Michigan in its Petition for Rulemaking.

The FCC has recognized the significant public interest benefits of clearing Channel 51 to the extent possible prior to the auction and repacking plan. In 2011, the FCC lifted the freeze on channel substitution rulemaking petitions to allow channel changes to Channel 51 stations.† The FCC has also stated in its recent *Report and Order (R&O)* in the auction and repacking plan, that such petitions are exempt from

* See FCC File No. BLCDDT-20040422ABI.

† *Public Notice*, "General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications," 26 FCC Red 11409 (MB 2011).

the Media Bureau's April 5, 2013 freeze on the filing of certain facilities modifications.[‡] In its *R&O* the Commission stated that it would continue to allow Petitions to reallocate stations from Channel 51 provided that the subject facilities are licensed by the Pre-Auction Licensing Deadline, which is now expected to be set by the FCC in the latter half of 2015.

The reallocation of WLAJ(TV) to Channel 25 would serve the public interest since it will allow for T-Mobile to launch advanced wireless services on the Lower 700 MHz Block A spectrum. The operation of WLAJ(TV) on Channel 25 would remove any potential interference with a wireless operation located directly adjacent to Channel 51 in the Lansing and greater Detroit markets.

WLAJ(TV) proposes to operate on UHF Channel 25 with a maximum ERP of 483.3 kW employing a directional antenna with an overall HAAT of 300 meters. The proposal is specified with facilities that will largely replicate the coverage of its licensed digital facility.[§] Specifications for the proposal are included herein at Figure 1.

Community of License Coverage Compliance

The proposed WLAJ(TV) allotment facility complies with the coverage requirements of Section 73.625 of the FCC Rules. A map showing the predicted coverage contours is included herein at Figure 2. As indicated, the predicted 48 dBu, f(50,90) contour encompasses the entire community of Lansing as required.

[‡] *Report and Order*, "In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions," GN Docket No. 12-268, Released: June 2, 2014.

[§] The WLAJ facility employs a broadband panel antenna. There is a change in the proposed antenna azimuth pattern from what is licensed due to shift in frequency. However, taking into consideration the predicted service losses due to terrain attenuation and interference received, the proposed facility will provide service to 103.8% of the population of the licensed WLAJ(TV) facility.

Allocation Concerns

The proposed Channel 25 facility meets the requirements of Section 73.616 of the FCC Rules concerning predicted interference to other DTV allotments and assignment records. Longley-Rice interference analyses were conducted pursuant to the requirements of the FCC Rules and FCC OET Bulletin No. 69^{**}. The results of the interference analyses for the proposed facility are summarized herein at Figure 3. As indicated therein, the proposed facility will meet the 0.5% *de minimis* interference criterion outlined in the FCC Rules to all pertinent allotments and assignments.

The proposed facility is located 116.5 km from the U.S.-Canadian border, which is within the coordination zone with Canada. Therefore the proposal will require coordination with the Canadian administration.

Repacking Flexibility Analysis

In order to evaluate the effect of this proposal on the repacking flexibility in the auction and repacking process, a comparison of the predicted 41 dBu noise-limited service contour coverage was prepared. As indicated in the map attached at Figure 4 herein, the proposal will not result in any increase in the predicted 41 dBu noise-limited service contour in any direction relative to the licensed Channel 51 facility. Therefore, there would be no adverse effect on the FCC's repacking flexibility in the auction and repacking process.

Conclusion

The instant proposal was designed to meet the FCC's *de minimis* interference requirements for protection to other facilities and the coverage requirements of the WLJ(TV) community of license of Lansing, Michigan. In addition, the proposal

^{**} See *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, OET Bulletin 69, Federal Communications Commission (February 6, 2004).

was designed to provide replication of the interference-free noise-limited service population of WLAJ(TV), while not adversely affecting the FCC's repacking flexibility in the auction and repacking process. In view of the forgoing, it is concluded that the instant proposal meets the FCC's requirements and that its approval would serve the public interest.



Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, FL 34237

October 30, 2014

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WLAJ(TV)
LANSING, MICHIGAN

Technical Specifications

Channel / Frequency Band	25 / 536-542 MHz
Zone	I
Reference Coordinates (NAD 27):	
Latitude	42°25'13" N
Longitude	84°31'25" W
Height of Radiation Center Above Mean Sea Level	589 m
Height of Radiation Center Above Ground Level	302 m
Height of Radiation Center Above Average Terrain (HAAT)	300 m
Maximum Effective Radiated Power (ERP)	483.3 kW

Directional Antenna Relative Field Values (See Sheet 2 for Polar Graph)					
Degrees	Value	Degrees	Value	Degrees	Value
0	0.981	120	0.398	240	0.730
10	0.935	130	0.476	250	0.815
20	0.818	140	0.546	260	0.936
30	0.675	150	0.666	270	0.956
40	0.565	160	0.846	280	0.895
50	0.458	170	0.977	290	0.796
60	0.382	180	1.000	300	0.748
70	0.393	190	0.934	310	0.767
80	0.460	200	0.827	320	0.746
90	0.460	210	0.759	330	0.729
100	0.419	220	0.769	340	0.820
110	0.379	230	0.743	350	0.951
Additional Azimuths:					
Antenna Rotation : none					

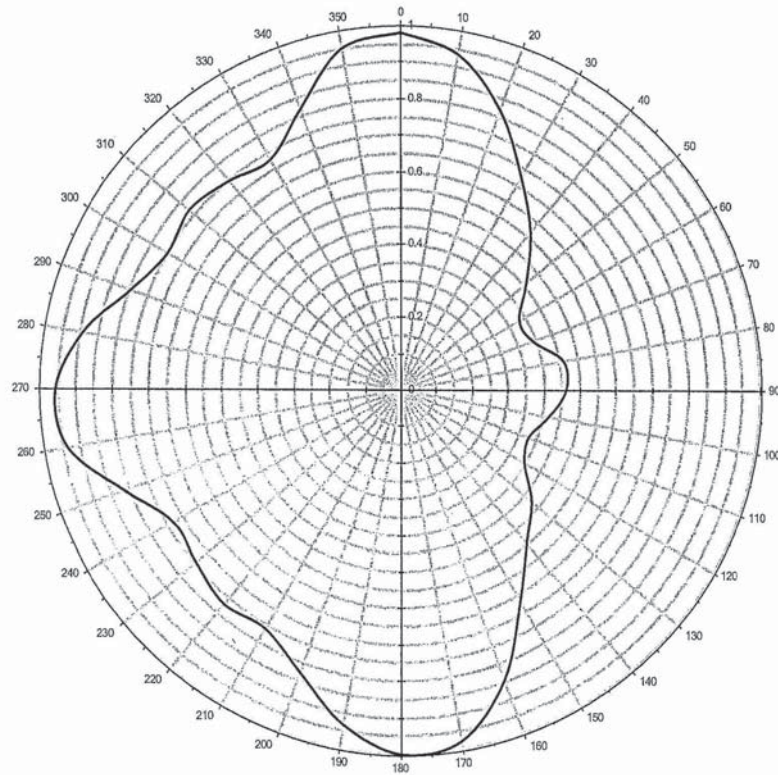
Figure 1
Sheet 2 of 2

DA Inquiry

du Treil, Lundin, & Rackley, Inc., Sarasota, Florida



Antenna ID: 800597



Note: display reflects rotation of 0.00°

0° 0.981	60° 0.382	120° 0.398	180° 1.000	240° 0.730	300° 0.748
10° 0.935	70° 0.393	130° 0.476	190° 0.934	250° 0.815	310° 0.767
20° 0.818	80° 0.460	140° 0.546	200° 0.827	260° 0.936	320° 0.746
30° 0.675	90° 0.460	150° 0.666	210° 0.759	270° 0.956	330° 0.729
40° 0.565	100° 0.419	160° 0.846	220° 0.769	280° 0.895	340° 0.820
50° 0.458	110° 0.379	170° 0.977	230° 0.743	290° 0.796	350° 0.951

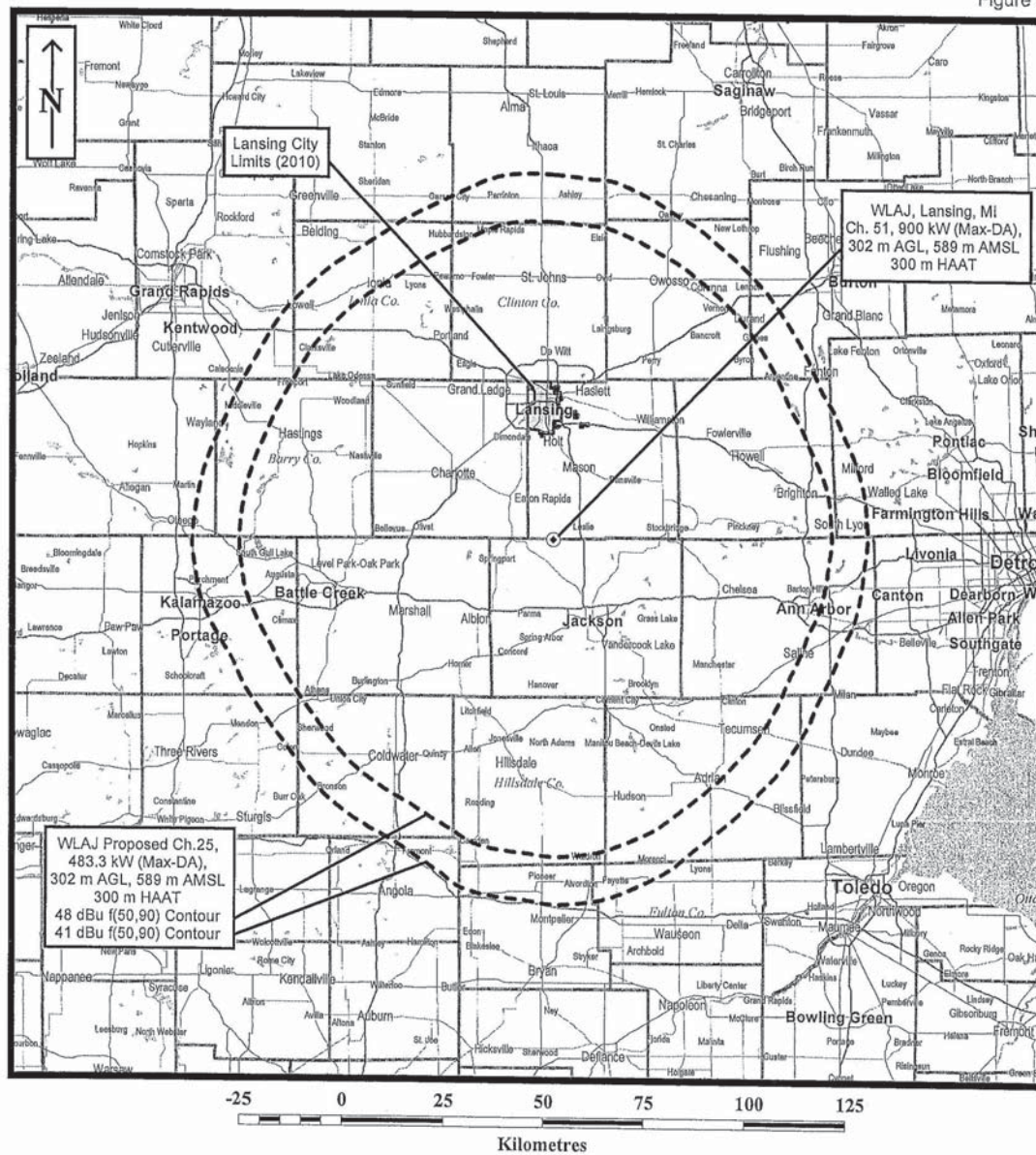
Antenna Make: ODD

Standard Pattern:

Antenna Model: ODDWLAJ

Last Change Date:

Figure 2



PREDICTED SERVICE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3

TECHNICAL EXHIBIT
IN SUPPORT OF PETITION FOR RULEMAKING
TELEVISION STATION WLAJ(TV)
LANSING, MICHIGAN

Interference Analysis Pursuant to
Office of Engineering and Technology Bulletin No. 69

(5 pages follow)

OET-69 Interference Analysis (WLAJ(TV), Lansing, MI, Channel 25) (Summary Results)

Percent allowed new interference: 0.500
Percent allowed new interference to non Class A LPTV: 2.000
TW Census data selected 2000
Data Base Selected
/export/home/cdbs/pt_tvdb.sff
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-30-2014

Record Selected for Analysis

WLAJ25 USERRECORD-01 LANSING MI US
Channel 25 ERP 483.29 kW HAAT 300. m RCAMSL 00589 m
Latitude 042-25-13 Longitude 0084-31-25
Status APP Zone 1 Border Site number: 01
Dir Antenna Make usx Model TUF-C4-10/40H2 Beam tilt N Ref Azimuth 0.
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility (site # 01) meets maximum height/power limits

Site number 1	ERP	HAAT	41.0 dBu F(50,90)
Azimuth (Deg)	(kW)	(m)	(km)
0.0	465.099	301.7	89.970
45.0	126.444	293.6	79.216
90.0	102.264	298.3	78.399
135.0	126.197	303.1	80.169
180.0	483.290	295.0	89.386
225.0	276.218	295.5	84.729
270.0	441.696	299.9	89.275
315.0	276.583	313.3	86.982

Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap
to Class A stations from site # 01

Class A Evaluation Complete

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is within the Canadian coordination distance
Distance to border = 116.5km

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Call	City/State	ARN
25	WLAJ25	LANSING MI	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
24	WPTA	FORT WAYNE IN	156.4	LIC	BLCDT	20031031AGU
24	WTLJ	MUSKEGON MI	127.3	APP	BPCDT	20140210AAX

OET-69 Interference Analysis (WLAJ(TV), Lansing, MI, Channel 25) (Summary Results)

24	WTLJ	MUSKEGON MI	127.4	LIC	BLCDT	20101007AAX
25	WRTV	INDIANAPOLIS IN	313.4	LIC	BLCDT	20090623ACJ
25	WOGC-CD	HOLLAND MI	125.1	LIC	BLDTA	20120316ADA
25	WCGV-TV	MILWAUKEE WI	285.9	LIC	BLCDT	20120405ACO
26	WCMU-TV	MOUNT PLEASANT MI	158.2	LIC	BLCDT	20130710ABN
33	W33BY	DETROIT MI	105.3	LIC	BLTTA	20020301ABU

#####

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
24	WPTA	FORT WAYNE IN	BLCDT	-20031031AGU

Stations Potentially Affecting This Station

Proposal causes no interference

#####

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
24	WTLJ	MUSKEGON MI	BPCDT	-20140210AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
24	WPTA	FORT WAYNE IN	214.3	LIC	BLCDT	-20031031AGU
24	WCML	ALPENA MI	279.5	LIC	BLEDT	-20110707ABQ
24	WSFU-TV	NEWARK OH	416.4	LIC	BLCDT	-20060620ABC
24	WHRM-TV	WAUSAU WI	373.7	LIC	BLEDT	-20051014AAW
25	WCGV-TV	MILWAUKEE WI	163.5	LIC	BLCDT	-20120405ACO
25	WLAJ25	LANSING MI	127.3	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1

Scenario 1 Affected station 2

Before Analysis

Results for: 24A MI MUSKEGON BPCDT 20140210AAX APP

HAAT 283.0 m, ATV ERP 310.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	1536554	21127.2
not affected by terrain losses	1535463	21099.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	27147	145.3
lost to ATV IX only	27147	145.3
lost to all IX	27147	145.3

Potential Interfering Stations Included in above Scenario 1

24A IN FORT WAYNE	BLCDT	20031031AGU	LIC
24A MI ALPENA	BLEDT	20110707ABQ	LIC

After Analysis

Results for: 24A MI MUSKEGON BPCDT 20140210AAX APP

HAAT 283.0 m, ATV ERP 310.0 kW	POPULATION	AREA (sq km)
within Noise Limited Contour	1536554	21127.2
not affected by terrain losses	1535463	21099.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	28199	193.7
lost to ATV IX only	28199	193.7
lost to all IX	28199	193.7

Potential Interfering Stations Included in above Scenario 1

24A IN FORT WAYNE	BLCDT	20031031AGU	LIC
24A MI ALPENA	BLEDT	20110707ABQ	LIC
25A MI LANSING	USERRECORD01		APP

Percent new IX = 0.0697%

Worst case new IX 0.0697% Scenario 1

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OET-69 Interference Analysis (WLAJ(TV), Lansing, MI, Channel 25) (Summary Results)

Analysis of Interference to Affected Station 3

Analysis of current record
Channel Call City/State Application Ref. No.
24 WTLJ MUSKEGON MI BLCDT -20101007AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
24	WPTA	FORT WAYNE IN	214.5	LIC	BLCDT -20031031AGU
24	WCML	ALPENA MI	279.4	LIC	BLEDT -20110707ABQ
24	WSFJ-TV	NEWARK OH	416.5	LIC	BLCDT -20060620ABC
24	WHRM-TV	WAUSAU WI	373.6	LIC	BLEDT -20051014AAW
25	WCGV-TV	MILWAUKEE WI	163.4	LIC	BLCDT -20120405ACO
25	WLAJ25	LANSING MI	127.4	APP	USERRECORD-01

Total scenarios = 1

Result key: 2
Scenario 1 Affected station 3
Before Analysis

Results for: 24A MI MUSKEGON BLCDT 20101007AAX LIC
HAAT 283.0 m, ATV ERP 310.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1534289	21138.8
not affected by terrain losses	1533200	21098.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	26286	133.2
lost to ATV IX only	26286	133.2
lost to all IX	26286	133.2

Potential Interfering Stations Included in above Scenario 1

24A IN FORT WAYNE	BLCDT	20031031AGU	LIC
24A MI ALPENA	BLEDT	20110707ABQ	LIC
24A WI WAUSAU	BLEDT	20051014AAW	LIC

After Analysis

Results for: 24A MI MUSKEGON BLCDT 20101007AAX LIC
HAAT 283.0 m, ATV ERP 310.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1534289	21138.8
not affected by terrain losses	1533200	21098.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	27230	173.5
lost to ATV IX only	27230	173.5
lost to all IX	27230	173.5

Potential Interfering Stations Included in above Scenario 1

24A IN FORT WAYNE	BLCDT	20031031AGU	LIC
24A MI ALPENA	BLEDT	20110707ABQ	LIC
24A WI WAUSAU	BLEDT	20051014AAW	LIC
25A MI LANSING	USERRECORD01	APP	

Percent new IX = 0.0626%

Worst case new IX 0.0626% Scenario 1

#####

Analysis of Interference to Affected Station 4

Analysis of current record
Channel Call City/State Application Ref. No.
25 WRTV INDIANAPOLIS IN BLCDT -20090623ACJ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
24	WPTA	FORT WAYNE IN	158.9	LIC	BLCDT -20031031AGU
24	WCVN-TV	COVINGTON KY	174.5	LIC	BLEDT -20020201ABJ
25	WEEK-TV	PEORIA IL	295.2	LIC	BLCDT -20090413AER
25	WTVF	NASHVILLE TN	406.8	LIC	BLCDT -20120913AAW
25	WTVF-DR	NASHVILLE TN	406.8	APP	BPFS -20100830ACL
25	WCGV-TV	MILWAUKEE WI	382.6	LIC	BLCDT -20120405ACO
26	WCCU	URBANA IL	152.9	LIC	BLCDT -20050317ADS
26	WLKY	LOUISVILLE KY	173.1	LIC	BLCDT -20030129AFL

OET-69 Interference Analysis (WLAJ(TV), Lansing, MI, Channel 25) (Summary Results)

26	WBDT	SPRINGFIELD OH	167.3	LIC	BLCDT	-20090619AAV
25	WLAJ25	LANSING MI	313.4	APP	USERRECORD-01	

Total scenarios = 1

Result key: 3
Scenario 1 Affected station 4
Before Analysis

Results for: 25A IN INDIANAPOLIS BLCDT 20090623ACJ LIC
HAAT 294.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2645975	30446.7
not affected by terrain losses	2624028	30075.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	6764	51.9
lost to ATV IX only	6764	51.9
lost to all IX	6764	51.9

Potential Interfering Stations Included in above Scenario 1

25A IL PEORIA	BLCDT	20090413AER	LIC
25A WI MILWAUKEE	BLCDT	20120405ACO	LIC
26A KY LOUISVILLE	BLCDT	20030129AFL	LIC

After Analysis

Results for: 25A IN INDIANAPOLIS BLCDT 20090623ACJ LIC
HAAT 294.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2645975	30446.7
not affected by terrain losses	2624028	30075.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	6879	59.9
lost to ATV IX only	6879	59.9
lost to all IX	6879	59.9

Potential Interfering Stations Included in above Scenario 1

25A IL PEORIA	BLCDT	20090413AER	LIC
25A WI MILWAUKEE	BLCDT	20120405ACO	LIC
26A KY LOUISVILLE	BLCDT	20030129AFL	LIC
25A MI LANSING	USERRECORD01	APP	

Percent new IX = 0.0044%

Worst case new IX 0.0044% Scenario 1

#####

Analysis of Interference to Affected Station 5

Analysis of current record
Channel Call City/State Application Ref. No.
25 WGGC-CD HOLLAND MI BLDTA -20120316ADA

Stations Potentially Affecting This Station

Proposal causes no interference

#####

Analysis of Interference to Affected Station 6

Analysis of current record
Channel Call City/State Application Ref. No.
25 WCGV-TV MILWAUKEE WI BLCDT -20120405ACO

Stations Potentially Affecting This Station

Proposal causes no interference

#####

Analysis of Interference to Affected Station 7

Analysis of current record
Channel Call City/State Application Ref. No.
26 WCMU-TV MOUNT PLEASANT MI BLEDT -20130710ABN

OET-69 Interference Analysis (WLAJ(TV), Lansing, MI, Channel 25) (Summary Results)

Stations Potentially Affecting This Station

Proposal causes no interference

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application Ref. No.
33	W33BY	DETROIT MI	BLTTA -20020301ABU

Stations Potentially Affecting This Station

Proposed station is beyond the site to
nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application Ref. No.
25	WLAJ25	LANSING MI	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
24	WPTA	FORT WAYNE IN	156.4	LIC	BLCDDT -20031031AGU
24	WTLJ	MUSKEGON MI	127.3	APP	BPCDDT -20140210AAX
24	WTLJ	MUSKEGON MI	127.4	LIC	BLCDDT -20101007AAX
25	WRTV	INDIANAPOLIS IN	313.4	LIC	BLCDDT -20090623ACJ
25	WCGV-TV	MILWAUKEE WI	285.9	LIC	BLCDDT -20120405ACO
26	WCMU-TV	MOUNT PLEASANT MI	158.2	LIC	BLEDT -20130710ABN

Total scenarios = 2

Result key: 4

Scenario 1 Affected station 9
Before Analysis

Results for: 25A MI LANSING		USERRECORD01	APP
HAAT 300.0 m, ATV ERP 483.3 kW			
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1794688	23462.3	
not affected by terrain losses	1788132	23397.9	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	8987	153.0	
lost to ATV IX only	8987	153.0	
lost to all IX	8987	153.0	

Potential Interfering Stations Included in above Scenario 1

24A MI MUSKEGON	BLCDDT	20101007AAX	LIC
25A IN INDIANAPOLIS	BLCDDT	20090623ACJ	LIC
25A WI MILWAUKEE	BLCDDT	20120405ACO	LIC

Result key: 5

Scenario 2 Affected station 9
Before Analysis

Results for: 25A MI LANSING		USERRECORD01	APP
HAAT 300.0 m, ATV ERP 483.3 kW			
	POPULATION	AREA (sq km)	
within Noise Limited Contour	1794688	23462.3	
not affected by terrain losses	1788132	23397.9	
lost to NTSC IX	0	0.0	
lost to additional IX by ATV	9658	165.0	
lost to ATV IX only	9658	165.0	
lost to all IX	9658	165.0	

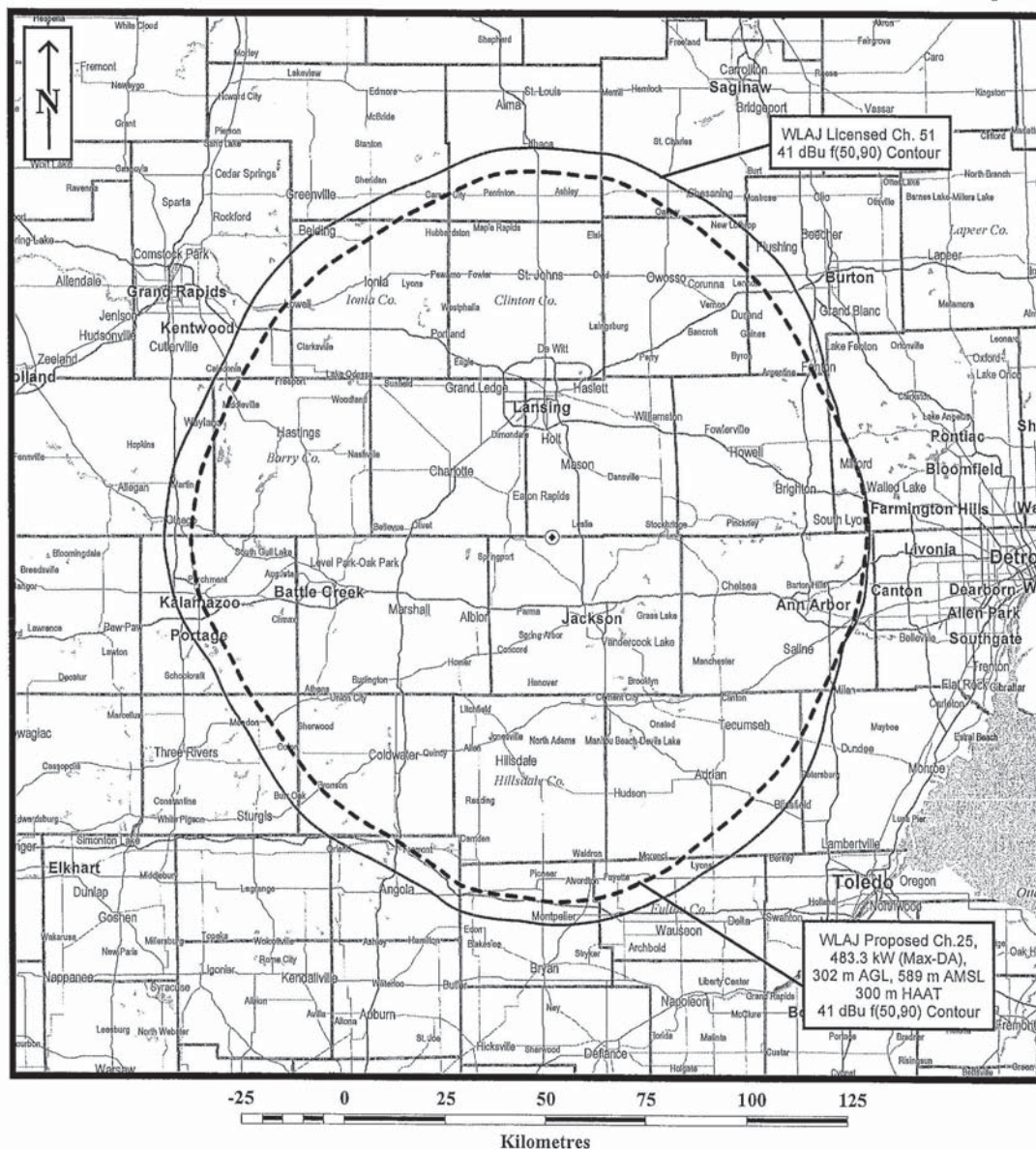
Potential Interfering Stations Included in above Scenario 2

24A MI MUSKEGON	BPCDDT	20140210AAX	APP
25A IN INDIANAPOLIS	BLCDDT	20090623ACJ	LIC
25A WI MILWAUKEE	BLCDDT	20120405ACO	LIC

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

Figure 4



PREDICTED COVERAGE COMPARISON

duTreil, Lundin & Rackley, Inc. Sarasota, Florida